



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

NOV 29 2012

James F. Thompson  
Lathrop & Gage LLP  
2345 Grand Boulevard, Suite 2200  
Kansas City, Missouri 64108-2618

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DUDD

Re: Request for Information for Radiation- Standard Products, Inc. Site at 650 East Gilbert Street, Wichita, Kansas and the Radiation- Standard Precision, Inc. (former) Superfund Sites, 4105-4129 Pawnee Street, Wichita, Kansas

Dear Mr. Thompson:

As counsel for Raytheon Company (Raytheon), you are receiving this letter on its behalf. This letter seeks your cooperation in providing information and documents relating to the contamination at the Radiation-Standard Products, Inc. Superfund Site, Inc. 650 East Gilbert Street, Wichita, Kansas and the Radiation- Standard Precision, Inc. (former) Superfund Site, at 4105-4129 Pawnee Street, Wichita, Kansas. Please refer to your November 29, 2010 submittal to the U.S. Environmental Protection Agency.

The EPA encourages you to give this matter your immediate attention. We also request that you provide a complete and truthful response to this Information Request (Attachment A) and attached questions (Attachment B) within thirty (30) days of your receipt of this letter.

Description of Legal Authority

The federal "Superfund" law (the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9601, *et seq.*, commonly referred to as "CERCLA" and "Superfund" grants the EPA the authority to, among other things: (1) assess contaminated sites, (2) determine the threats to human health and the environment posed by each Site, and (3) clean up those Sites in the order of the relative threats posed by each. In addition, pursuant to Section 104(e)(C), 42 U.S.C. § 9604(e)(C), EPA may obtain information relating to the ability of a person to pay for or to perform a cleanup.

Information Request

Under Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604(e)(2), the EPA has broad information gathering authority which allows the EPA to require persons to furnish information or documents relating to:

- A. the identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility;
- B. the nature or extent of a release or threatened release of hazardous substance or pollutant or contaminant at or from a vessel or facility; and
- C. information relating to the ability of a person to pay for or to perform a cleanup.



While the EPA seeks your cooperation in this investigation, compliance with the Information Request is required by law. Pursuant to Section 104 of CERCLA, 42 U.S.C. § 9604, the EPA is authorized to seek penalties if you fail to respond in a timely manner or if you fail to respond adequately to the Information Request. In addition, false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under 18 U.S.C. § 1001.

Some of the information the EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you would like the EPA to treat the information in a confidential manner, you must advise the EPA of that fact by following the procedures outlined in Attachment A, including the requirement for supporting your claim for confidentiality.

If you have information about other person(s) who may assist the EPA in its investigation of the Sites or may be responsible for the contamination at the Sites, that information should be submitted within the timeframe noted above.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

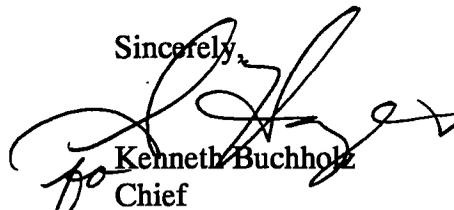
You should mail your response to:

Denise Roberts  
Senior Assistant Regional Counsel  
U.S. Environmental Protection Agency  
Office of Regional Counsel  
11201 Renner Road  
Lenexa, Kansas 66219.

If you have additional questions about the nature of the environmental conditions at the Sites, or the status of cleanup activities, please contact the On-Scene Coordinators, Randy Schademann, at (913) 551-7331 regarding the Radiation- Standard Products, Inc. Superfund Site and Megan Schuette at (913) 551-7630 regarding the Radiation- Standard Precision Inc. (Former) Superfund Site. If you have questions about the Information Request or legal matters relating to the Sites, contact the staff attorney for the Sites, Denise Roberts at (913) 551-7559.

We appreciate your prompt response to this Information Request.

Sincerely,



Kenneth Buchholz  
Chief

Emergency Response and Removal North Branch  
Superfund Division

Enclosures

## Attachment A Information Request

### Instructions

1. **Answer Every Question Completely.** A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this information request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. **Number Each Answer.** Precede each answer with the corresponding number of the question and the subpart to which it responds.
3. **Provide the Best Information Available.** Provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to you will be considered non-compliance with this Information Request.
4. **Identify Sources of Answer.** For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
5. **Continuing Obligation to Provide Correct Information.** If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Should you find, at any time after submission of your response, that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.
6. **Confidential Information.** The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), and 40 C.F.R. § 2.203(b).

If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

- a. the portions of the information alleged to be entitled to confidential treatment;
- b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
- c. measures taken by you to guard against the undesired disclosure of the information to others;
- d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;

## Attachment A Information Request

- e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

7. Disclosure to EPA Contractor. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. § 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within thirty (30) days of receiving this Information Request.

8. Personal Privacy Information. Personnel and medical files, and similar files, the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."

9. Objections to Questions. If you have objections to some or all of the questions within the Information Request letter, you are still required to respond to each of the questions.

### Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

## **Attachment A Information Request**

### Definitions

1. The term “you” or “your” or “Respondent” shall mean the Raytheon Company (Raytheon). The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of Raytheon.
2. The term “person” shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.
3. The term “Site” shall mean the Radiation-Standard Products, Inc. Site at 650 East Gilbert and the Radiation-Standard Precision, Inc. Superfund Site, at 4105-4129 Pawnee Street, Wichita, KS.
4. The term “hazardous substance” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
5. The term “pollutant or contaminant” shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations; and includes any mixtures of such pollutants and contaminants with any other substances, including petroleum products; and is that same definition as that contained in Section 101(33) of CERCLA.
6. The term “hazardous waste” shall mean a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical or infectious characteristics may:
  - a. cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or
  - b. pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed; and is the same definition as that contained in Section 1004(5) of RCRA.
7. The term “materials” shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site, including, but not limited to, all goods, substances, hazardous substances, pollutants and contaminants, hazardous wastes and solid wastes, as defined in these definitions.
8. The term “solid waste” means any trash, garbage, refuse, by-products, sludges, and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities, and is the same definition as that contained in Section 1004 (27) of RCRA.

**Attachment A**  
**Information Request**

9. The term "identify" means, with respect to a natural person, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name, and address) with title, position, or business.

10. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term "identify" means to provide its full name, address, and affiliation with the individual and/or company to whom/which this request is addressed.

11. The term "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

12. The term "arrangement" means every separate contract or other agreement between two or more persons, whether written or oral.

13. The term "release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.

14. "Standard Precision" shall include "Standard Precision, Inc.", "Standard Precision Division", Standard Precision Division of Electronic Communications, Inc.", Standard Precision of ECI," or "Standard Precision Company."

15. "Standard Products" shall include "Standard Products, Inc." or "Standard Products Company."

## **Attachment B Questions**

1. Identify the person(s) answering these questions on your behalf, including such person's name, title, affiliation, business address and telephone number.
2. For each and every question and subpart, identify all persons consulted or persons who aided in the preparation of the answer.
3. For each and every question and subpart, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to that question or subpart. In addition, provide clear and readable copies of the above described documents.
4. Provide all incorporation documents filed with any Secretary of State and any Electronic Communications, Inc. (ECI) corporate documents including transaction documents and attachments, board of director minutes, and correspondence among directors or officers with the appropriate Secretary of State showing that ECI incorporated Air Associates, Inc. as stated on page 4 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.
5. Provide all documents showing that Production Products became a wholly owned subsidiary of Standard Products, as stated on page 4 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.
6. Provide all incorporation, sale/purchase and other transaction documents; and corporate documents, including attachments to all previously described documents, board of director minutes, correspondence, and all documents filed with the Secretary of State or the Security and Exchange Commission (SEC) reflecting showing Air Associates, Inc., or Air Associates as a subsidiary to ECI; or showing Air Associates, Inc., or Air Associates, as a division of ECI; and/or showing Air Associates, Inc., or Air Associates as a separate corporation.
7. Over what period of time was Air Associates or Air Associates, Inc a division of Electronic Communications, Inc. (ECI)? Provide all documents upon which you base your answer.
8. Over what period of time was Standard Products, Inc. a subsidiary of Electronic Communications, Inc. (ECI)? (Attached for your reference is an entry from Moody's Industrial Manual dated 1963 from Tab F of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.) Provide all documents upon which you base your answer.
9. Over what period of time was Standard Products, Inc. a subsidiary of Air Associates, Inc.? (Attached for your reference is an entry from Moody's Industrial Manual dated 1963 from Tab F of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.) Provide all documents upon which you base your answer.
10. Over what period of time was Standard Precision, Inc. a subsidiary of Electronic Communications, Inc. (ECI)? (Attached for your reference is an entry from Moody's Industrial Manual dated 1964 from Tab F of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.) Provide all documents upon which you base your answer.

## **Attachment B Questions**

11. Provide all corporate, sale/purchase, and other transaction documents including attachments to all previously described documents, board of director minutes, correspondence, and all documents filed with the Secretary of State or SEC establishing the date and fact that Air Associates, Inc. or Air Associates Division of ECI acquired the stock of Standard Products, Inc., as stated on page 4 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.

12. Provide all corporate, sale/purchase, and other transaction documents including attachments to all previously described documents, board of director minutes, correspondence, and all documents filed with the Secretary of State or SEC establishing the date and fact that Production Products was a subsidiary of Standard Products and/or owned by Standard Products as stated on page 4 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.

13. Provide all corporate, sale/purchase, and other transaction documents including attachments to all previously described documents, board of director minutes, correspondence, and all documents filed with the Secretary of State or SEC establishing the fact that Standard Products was wholly owned by Air Associates or Air Associates Division of ECI as stated on page 4 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.

14. Provide all corporate, sale/purchase, and other transaction documents including attachments; board of director minutes, correspondence, and all documents filed with the Secretary of State or SEC establishing the date and fact that Electronic Communications, Inc. sold Advanced Technology Division in 1962 as stated on page 5 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter, and sold its subsidiary Air Associates, Inc., as shown in Moody's Industrial Manual for 1963. (Attached for your reference is an entry from Moody's Industrial Manual dated 1963 appearing under Tab F to Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.)

15. Provide all corporate, transaction documents including attachments to all previously described documents; board of director minutes, board of director minutes, correspondence, and documents filed with the Secretary of State or SEC reflecting any and all corporate changes made to Advanced Technology Corporation and/or Advanced Technology Division between 1959 and 1963.

16. Provide all corporate documents; sale/purchase and other transaction documents including attachments to all previously described documents; board of director minutes, correspondence, and documents filed with the Secretary of State or SEC reflecting that ECI restructured its corporate hierarchy causing Production Products to become wholly owned by Advanced Technology Corporation, as stated on page 4-5 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.

17. Provide all corporate, sale/purchase and other transaction documents including attachments to all previously described documents; board of director minutes, and correspondence establishing the date and status which would explain whether Production Products, Production Products, Inc., Standard Products and/or Standard Products, Inc was or was not a subsidiary of Electronic communications, Inc. If Production Products or Production Products, Inc. and/or Standard Products, or Standard Products, Inc. were not a subsidiary of ECI, then provide all corporate, sale/purchase and transaction documents including attachments to all previously described documents; board of director minutes, and

**Attachment B**  
**Questions**

correspondence establishing its/their status, as stated on page 4-5 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.

18. Provide all corporate, sales/purchase and other transaction documents including attachments to all previously described documents; board of director minutes and documents filed with the Secretary of State or SEC showing that Electronic Communications, Inc. sold its Air Associates, Inc. subsidiary to Van Dusen Air Craft Supplies, Inc., and that Aviall, Inc. is the successor to Van Dusen as stated on page 5 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.

19. Provide any and all leases showing that Air Associates Division or Air Associates, Inc. acquired a lease at 650 East Gilbert, Wichita, Kansas, as stated on page 5 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.

20. State all purposes for which Air Associates Division or Air Associates, Inc. leased 650 East Gilbert, Wichita, Kansas. Provide any and all documents supporting your response.

21. Provide all documents reflecting that Standard Precision purchased 650 East Gilbert, Wichita, Kansas, as stated on page 6 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter. Provide all documents showing the business purpose for Standard Precision's purchase of 650 East Gilbert.

22. Provide all corporate, sale, transaction documents, leases, including attachments to all previously described documents; board of director minutes, and correspondence relating to the dissolution of Standard Precision, Inc. by ECI in 1965, as stated on page 7 of Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.

23. For the previous question, provide all documents including deeds, leases, board of director minutes, correspondence, accounting records, including all schedules, showing assets retained "including title to the Gilbert Site, and the leasehold right to the Pawnee facility," as stated in Raytheon's response of November 29, 2010 on page 7, Item D to EPA in response to the General Notice Letter.

24. Describe what "properties, assets and rights of every description real, personal and mixed, tangible and intangible" were transferred to ECI as stated in item 3(a) on page 5 to the "Minutes of Meeting of the Board of Directors" held September 27, 1965 appearing under Tab S to Raytheon's response of November 29, 2010 to EPA in response to the General Notice Letter.

25. Provide all corporate documents, Secretary of State filings, board of director minutes and other correspondence showing that Electronic Communications, Inc. caused another Standard Precision or Standard Precision, Inc. subsidiary, division or entity to be created as stated on page 7 of your response dated November 29, 2010 and Tab S, page 8 of the "Minutes of Meeting of the Board of Directors of Electronic Communications, Inc., held September 27, 1965."

26. What was the business purpose for this newly created Standard Precision, Inc. or Standard Precision subsidiary, division or entity referred to in the question immediately above? Provide all documents declaring such business purpose.

## **Attachment B Questions**

27. After September 27, 1965, when ECI dissolved Standard Precision, why did ECI create “the so-called Standard Precision Division, an unincorporated business unit, to conduct further operation at the Pawnee site”, as stated on page 7 to Raytheon’s response of November 29, 2010 to EPA in response to the General Notice Letter.

28. Please refer to Question 27 in answering the following: what “further operations” were conducted at the Pawnee site by the Standard Precision Division and over what period of time? Provide all documents upon which you rely in answering.

29. Provide all corporate, sale, and transaction documents including attachments to all previously described documents related to the merger of Electronic Communications, Inc. with ECI Merger Corporation in 1971 as stated on page 8 of your response dated November 29, 2010 and Tab CC in the “Written Consent in Lieu of Special of the Board of Directors” of December 28, 1971.

30. Why did Electronic Communications, Inc. distribute Standard Precision Division as a dividend in kind to National Cash Register as reflected in the General Warranty Deed dated November 22, 1976 under Tab B of your response dated November 29, 2010. Provide all documents explaining such decision.

31. What assets and liabilities did Electronic Communications, Inc. retain of Standard Precision Division after the General Warranty Deed described in the previous question was filed? Provide a listing of all assets, liabilities held by Electronic Communications, Inc. after the filing of the General Warranty Deed of November 22, 1976, Tab B of Raytheon’s response of November 29, 2010 to EPA in response to the General Notice Letter.

32. Explain Standard Precision or Standard Precision, Inc.’s involvement in operations at 650 East Gilbert as reflected in Kansas Department of Health inspection of 650 East Gilbert as reflected in the attached inspection report of July 5, 1967.

33. Does Raytheon have any liability insurance to cover environmental liabilities for either Standard Precision, Inc. or Standard Products, Inc. at any facilities in Wichita, Kansas from 1965 to 1972?

1968	103 1/4	1969	103 1/4	1970	103
1971	102 3/4	1972	102 1/2	1973	102
1974	101 1/2	1975	101	1976	100 1/2

Also callable at 100 for sinking fund (which see).

**SINKING FUND**—Cash (or debentures) to remain at par on each Apr. 1, 1963-75 debentures at 10% of consolidated net income in excess of \$500,000, plus similar optional payment.

**VERTIBLE**—Into common to Apr. 1, 1971 (if called, on or before redemption date) at \$30.48 a share to Apr. 1, 1964 incl.; \$33.33 to Apr. 1, 1967 incl. and \$38.10 to Apr. 1, 1971 incl.; no adjustment made for interest or dividends; scrip or cash paid in lieu of fractional shares. Conversion privilege protected against dilution.

**SECURITY**—Not secured.  
**CREATION OF ADDITIONAL DEBT**—Company or any consolidated subsidiary may not create funded debt (except for refunding) unless thereafter on consolidated basis net tangible assets at least equal 150% of funded debt. Company or any subsidiary may not mortgage property, except for intercompany pledges from a subsidiary to its parent; purchase money liens on hereafter acquired properties up to 75% of lower of cost or fair value thereof; refundings, etc.

**DIVIDEND RESTRICTIONS**—Company may not pay cash dividends on common which would reduce consolidated net working capital below \$4,000,000 or if all dividend payments after Apr. 1, 1961 would exceed consolidated net income after June 30, 1960 plus \$500,000. At June 30, 1962, \$1,795,440 of retained earnings were not so restricted.

**RIGHTS ON DEFAULT**—Trustee or 25% of debentures may declare principal due and payable (30 days' grace for payment of interest or sinking fund).

**INDENTURE MODIFICATION**—Indenture may be modified, except as provided, with consent of 66 2/3% of debentures.

**PURPOSE**—Proceeds to retire \$1,580,625 5 1/2% notes; for new plant facilities and working capital.

**OFFERED**—(\$4,000,000) at 102 (proceeds to company, 99) on Mar. 22, 1961 by W. E. Hutton & Co., New York; Kalman & Co., Inc., St. Paul, and associates.

**PRICE RANGE**—1962, 162-95; 1961, 148-102.  
**Capital Stock: 1. Economics Laboratory, Inc. 4 1/2% cumulative preferred, series A; par \$20.**

**AUTHORIZED**—All series, 20,000 shares; outstanding June 30, 1962, series A, 3,980 shares; par \$20.

**PREFERENCES**—Has preference for assets and cumulative dividends of 90 cents per share annually payable J&D 15.

**DIVIDEND RESTRICTIONS**—No cash dividends may be paid on or purchase made of subordinate stock, except out of earnings subsequent to June 30, 1946 plus proceeds of sales of junior securities.

**DIVIDEND RECORD**—Initial dividend of \$4 cents paid Dec. 16, 1946; regular dividends paid semi-annually thereafter.

**VOTING RIGHTS**—Has no voting power unless two semi-annual dividends are in default, when preferred is entitled to elect one director; if four such dividends are in default, preferred is entitled to elect a majority of directors.

**LIQUIDATION RIGHTS**—In liquidation, entitled to \$20 per share if involuntary and to redemption price if voluntary, plus accrued dividends in either case.

**PREEMPTIVE RIGHTS**—None.  
**CALLABLE**—As a whole, or in part by lot, on 30 days' notice at \$20.50 per share and dividends.

Also callable for sinking fund, which see.  
**SINKING FUND**—Annually an amount sufficient to retire 400 shares of preferred by purchase or redemption at not exceeding \$20.25 per share.

**OFFERED**—(10,000 shares) at \$20 per share flat (proceeds to company \$18.50 per share) on July 24, 1946 by Kalman & Co., Inc., St. Paul.

**TRANSFER AGENT AND REGISTRAR**—First Trust Co., St. Paul.

**DIVIDEND DISBURSING AGENT**—Company.  
**2. Economics Laboratory, Inc. 4 1/2% cumulative preferred, series B; par \$20.**

Authorized, all series, 20,000 shares; outstanding, series B, 10,000 shares; par \$20. Held by Employee Retirement Trust.

Has equal preference with series A for assets and dividends. In any liquidation, entitled to \$20 per share and divs. Non-callable.

**3. Economics Laboratory, Inc., \$4 cumulative convertible preferred; no par.**  
**AUTHORIZED**—All series, 100,000 shares; outstanding, June 30, 1962, series A, 11,813 shares.

**PREFERENCES**—Has equal preference with series A and B for assets and cumulative dividends of \$4 annually payable J, A & O.  
**LIQUIDATION RIGHTS**—In liquidating entitled to \$105 per share.  
**PREEMPTIVE RIGHTS**—None.

**VERTIBLE**—Into common at \$33.33 a share from Apr. 2, 1964 to Mar. 1, 1967, thereafter to Apr. 1, 1971 at \$38.10.  
**SINKING FUND**—Annually an amount sufficient to retire 500 shares at \$105 a share.

Amount covering shares not tendered may be returned at option of company or called commencing 1964 at 105.

**ISSUED**—In Sept. 1961 in exchange for stock of Klenzade Products, Inc., on basis of one preferred and 4.42 common shares for each 15 Klenzade shares.

**TRANSFER AGENT AND REGISTRAR**—First National Bank, St. Paul.  
**4. Economics Laboratory, Inc. common; par \$1:**

**AUTHORIZED**—1,000,000 shares; outstanding, June 30, 1962, 599,165 shares; reserved for options, 42,126 shares; reserved for conversion of debentures, 116,273 shares; par \$1.

No par shares split 4-for-1 in Dec. 1952, changed from no par to \$1 par on Nov. 8, 1956, one additional share issued for each share held to effect 2-for-1 split.

**DIVIDEND LIMITATIONS**—See debentures and preferred above.  
**PREEMPTIVE RIGHTS**—None.

**DIVIDENDS**—(calendar years since 1936):  
 On no par shares before 4-for-1 split:

1937	\$1.00	1938	\$1.25	1939	\$1.35
1940	2.00	1941	3.50	1942	1.25
1943-44	2.50	1945	0.40	1946-47	0.80
1948-49	1.60	1950	2.40	1951	2.00
1952	1.00				

On no par shares after 4-for-1 split:  
 1953-- 0.50 1954-- 0.60 1955-- 0.75  
 1956-- 0.90

On \$1 par shares after 2-for-1 split:  
 [1957-61 0.80 [1962-- 1.00 [1963-- 0.25  
 [Also stock dividends: 1957 to 1960, incl., 5%; 1962, 5%.

[2] To Jan. 16, 1962.  
**OFFERED**—(100,000 shares) \$1 par common offered at \$15 per share (proceeds to company, \$13.75 per share) on Jan. 15, 1957 by W. E. Hutton & Co., New York, and Kalman & Co., Inc., St. Paul, and associates. Proceeds used to repay \$400,000 bank loan and for expansion.

**TRANSFER AGENTS**—Chase Manhattan Bank, New York, and First Trust Co., St. Paul.  
**REGISTRARS**—Chemical Bank New York Trust Co., New York and First National Bank, St. Paul.

**PRICE RANGE**— 1962 1961 1960 1959 1958  
 High 53 46 1/2 25 1/4 23 1/4  
 Low 28 1/2 24 1/4 19 18 1/4 13 1/4

**Stock Options** held by certain employees at June 30, 1962 on 32,492 common shares at prices from \$12.10 to \$35.24 per share; expire to 1967.

**ELECTRONIC COMMUNICATIONS, INC.**

**History:** Incorporated under the laws of New Jersey, May 27, 1940, as Air Associates, Inc. Represented merger and consolidation with former parent company of same name; incorporated in New York July 1, 1927; present name adopted Apr. 30, 1957.

On May 1, 1950, acquired Snyder Aircraft Corp., Chicago, now operated as a branch. In Sept., 1953 purchased Aviation Supply Corp. at Atlanta, Ga. Municipal Airport now operated as a branch.

In 1959, acquired by exchange of stock Standard Products, Inc. Wichita, Kans. and Advanced Technology Corp., Santa Barbara, Cal.

In 1962, sold Advanced Technology Division.

On Feb. 5, 1963, sold subsidiary Air Associates, Inc., for \$1,500,000 cash and about 12,000 shares of Van-Dusen Aircraft Supplies 4% preferred.

**Business:** Operations, in military communications and aircraft supply fields, conducted by following operating divisions and subsidiaries:

**St. Petersburg Division:** Engineers, designs and manufactures electronic equipment, including command and control communication receivers and transmitters and other communications systems for manned aircraft, ships, missiles, etc. Substantially all of sales are to Government and principal electronics and aerospace manufacturers.

**Research Div.:** Operates laboratory at Timonium, Md., near Baltimore, for advanced research in communications, radar and infrared fields.

**Facsimile Div.:** Designs, manufactures and distributes facsimile reproduction equipment.

**Standard Products, Inc.:** Subsidiary manufactures seat belts, aircraft instruments, electric motors, actuators and various mechanical items.

**Property:** Company owns 275,000 sq. ft. plant in St. Petersburg, Fla.

Research division has leased plant of 20,000 sq. ft. at Timonium (near Baltimore), Md.

Standard Products, Inc. leases 40,000 sq. ft. in Wichita, Kans.

Regional offices located at Washington, D. C.; Dayton, North Hollywood, Cal. Rome, N. Y., Huntsville, Ala. and Lexington, Mass.

**Subsidiaries** (wholly-owned): Standard Products, Inc. (Kans.).  
**Officers:** S. W. Bishop, Pres.; W. R. Yarnall, Chmn. of Bd. and Fin. Vice-Pres.; D. D. King, Vice-Pres. (Research); J. B. Williams, L. W. Wiley, Vice-Pres.; C. L. Lord, Vice-Pres., Sec.

and Treas.; P. G. Hansel, Vice-Pres.; E. A. Horvath, Contr.; T. F. Peppel, E. P. T. Smith, Jr., John Ernest, Asst. Sec.  
**Directors:** C. K. Baxter, J. B. Williams, H. A. Kroeger, W. E. Yarnall, J. P. Crawford, Jr., J. D. Kerr, E. P. T. Smith, Jr., Duncan Miller, W. D. Roosevelt, S. W. Bishop, G. R. Wilson.

**General Counsel:** Ballard, Spahr, Andrews & Ingersoll, Philadelphia.  
**Auditors:** Arthur Andersen & Co.  
**Annual Meeting:** Last Thursday in January.  
**No. of Stockholders,** Sept. 30, 1962: Preferred, 261; common, 2,496.  
**No. of Employees:** Sept. 30, 1962, 1,300.  
**Office:** 1501 72nd St. No., St. Petersburg 10, Fla.

**Unfilled Orders:** 1962 1961  
 As of Sept. 30 \$13,733,000 \$12,331,000  
**Consolidated Income Account, years ended**

1962	1961	1960
Net sales	\$36,885,199	\$22,280,994
Costs & expenses	34,840,649	21,161,840
Depreciation	288,684	263,429
Net earnings	1,755,866	855,725
Other income, net	30,116	32,971
Total income	1,725,750	888,696
Interest	291,603	322,543
Income taxes	726,000	260,000
Net income	708,147	306,153
Prev. earn. surp.	2,465,022	2,182,882
Preferred divs.	23,167	24,013
Earn. surplus, 9-30	3,150,002	2,465,022
Earn. pfd. share	18,152	\$7.85
Earn. com. share	0.95	0.46
No. of pfd. shares	38,237	38,983
No. of com. shares	719,728	617,482

[Reflects shs. sold.  
**Sales and Earnings, yrs. to Sept. 30 (in \$)**

Year	Net Sales	Net Income	No. of Shares	Earn. on Com.
1960	24,130,561	607,511	597,209	d 1.06
1959	32,771,830	855,139	590,076	1.40
1958	21,191,882	568,309	238,908	2.29
1957	21,191,882	250,418	238,908	0.90
1956	16,980,451	245,311	236,733	0.88
1955	14,237,111	95,986	235,933	0.25
1954	12,587,052	54,051	235,033	0.07
1953	18,233,740	344,311	235,033	1.31
1952	19,034,877	141,659	234,522	0.44
1951	16,244,452	46,695	234,522	0.03
1950	11,494,502	93,971	139,297	0.45

[Adjusted regarding preferred arrears.  
**Adjusted earnings & shs. for stk. splits & stk. divs.:**

Earnings (\$): 1958, 1.49; 1957, 0.60; 1956, 0.59; 1955, 0.17; 1954, 0.87; 1953, 0.29; 1952, 0.02; 1951, 0.40.

Shares: 1958, 358,362; 1957, 355,100; 1956, 353,900; 1955-54, 352,550; 1953-52, 351,783; 1951, 208,946.

**Consolidated Balance Sheet, as of Sept. 30:**

Assets:	1962	1961
Cash	\$1,139,668	\$987,849
Receivables, net	6,939,567	5,994,977
Inventories	6,156,909	5,397,426
Prepayments	258,900	188,375
Total current	\$14,495,044	\$12,568,627
Net property	3,143,924	2,764,389
Total	\$17,638,968	\$15,333,016

**Liabilities:**  
 Accts. payable \$3,407,590 \$2,383,218  
 Notes payable 2,860,770 4,029,750  
 Accrued tax, etc. 407,647 346,672  
 Income tax res. 544,637 526,336  
 Debt due 60,467 68,814

Total current \$7,281,111 \$7,354,790  
 6% pfd. stk. (\$10) 1,032,216 1,055,141  
 Common stk. (\$10) 382,370 389,830  
 Common stk. (\$10) 719,728 617,482  
 Capital surplus 5,073,541 3,450,751  
 Earned surplus 3,150,002 2,465,022

Total \$17,638,968 \$15,333,016  
 Net current assets \$7,213,933 \$5,213,837  
 Net tang. com. sh. \$12.43 \$10.58  
 [Depreciation \$1,513,423 \$1,367,986  
 [Lower cost (ifo) or mkt.

**V-Loan:** Outstanding, Sept. 30, 1962, \$2,700,000 under V-loan agreement dated June 28, 1951; as amended, which provides for revolving credit of \$5,000,000 to Feb. 28, 1963, evidenced by promissory notes with interest at 6%; loan is 70% guaranteed by Air Force.

**Company agrees to maintain net current assets of at least \$5,000,000. Except with consent of lenders, company may not pay cash dividends on common or reacquire any stock.**

**Term Loans:** Outstanding, Sept. 30, 1962, \$1,032,216, evidenced by 4% promissory note payable annually to 1965; 6 1/2% first mortgage secured 5% note of subsidiary payable \$5,000 quarterly to 1963.

**Capital Stock: 1. Electronic Communications, Inc. 6% cumulative convertible preferred; par \$10:**

**AUTHORIZED**—200,000 shares; outstanding, Sept. 30, 1962, 38,237 shares; par \$10.  
**PREFERENCES**—Has preference for assets and dividends.

**DIVIDEND RIGHTS**—Entitled to cumulative dividends of 60 cents per share annually payable quarterly Jan. 15, etc., to stock of record on Jan. 2, etc.

1963

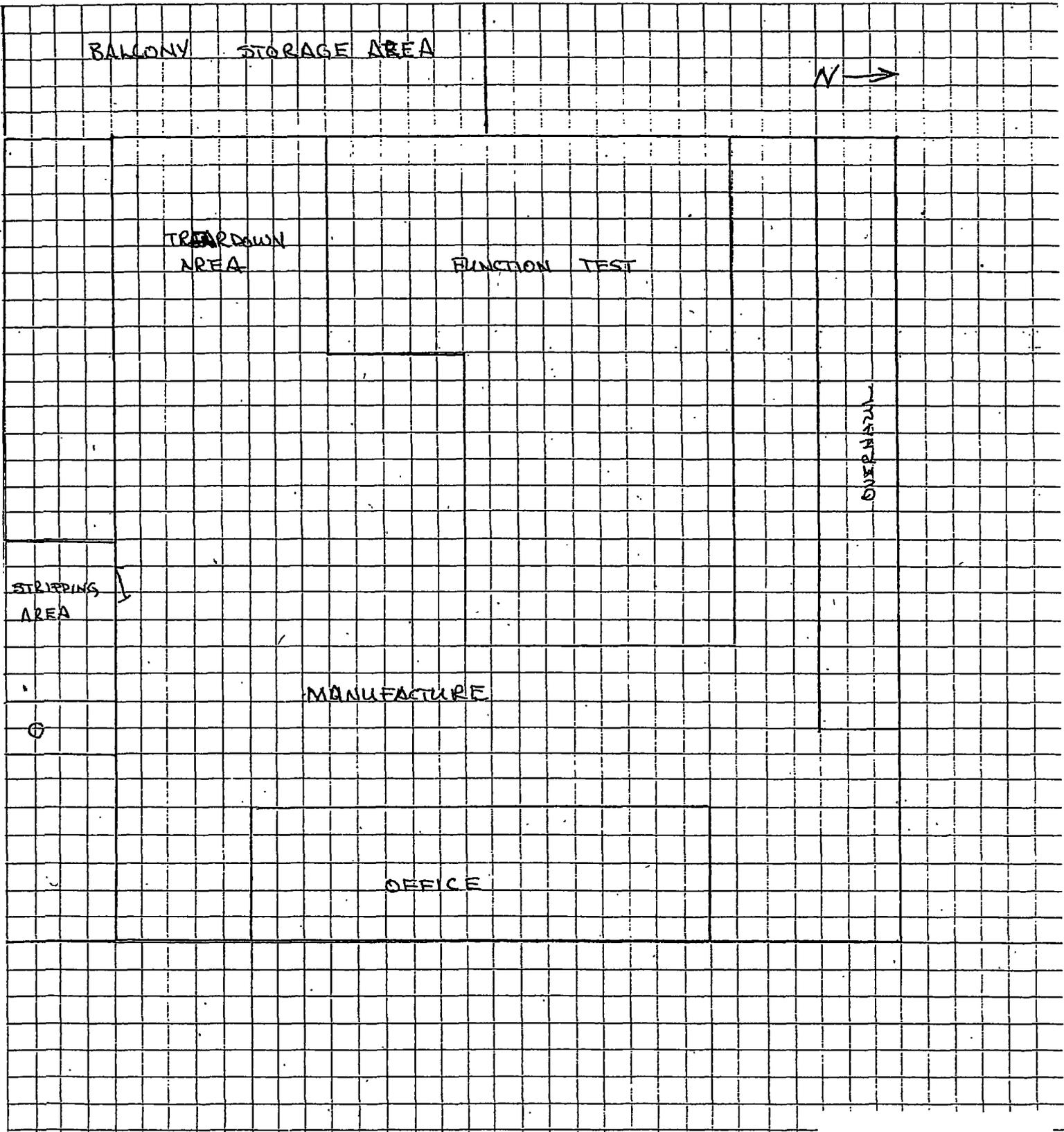


KANSAS STATE DEPARTMENT OF HEALTH  
ENVIRONMENTAL HEALTH SERVICES

Subject \_\_\_\_\_ Date \_\_\_\_\_

PLANT SKETCH

Reviewed by \_\_\_\_\_ Checked \_\_\_\_\_ Sheet \_\_\_\_\_ of \_\_\_\_\_ Sheets

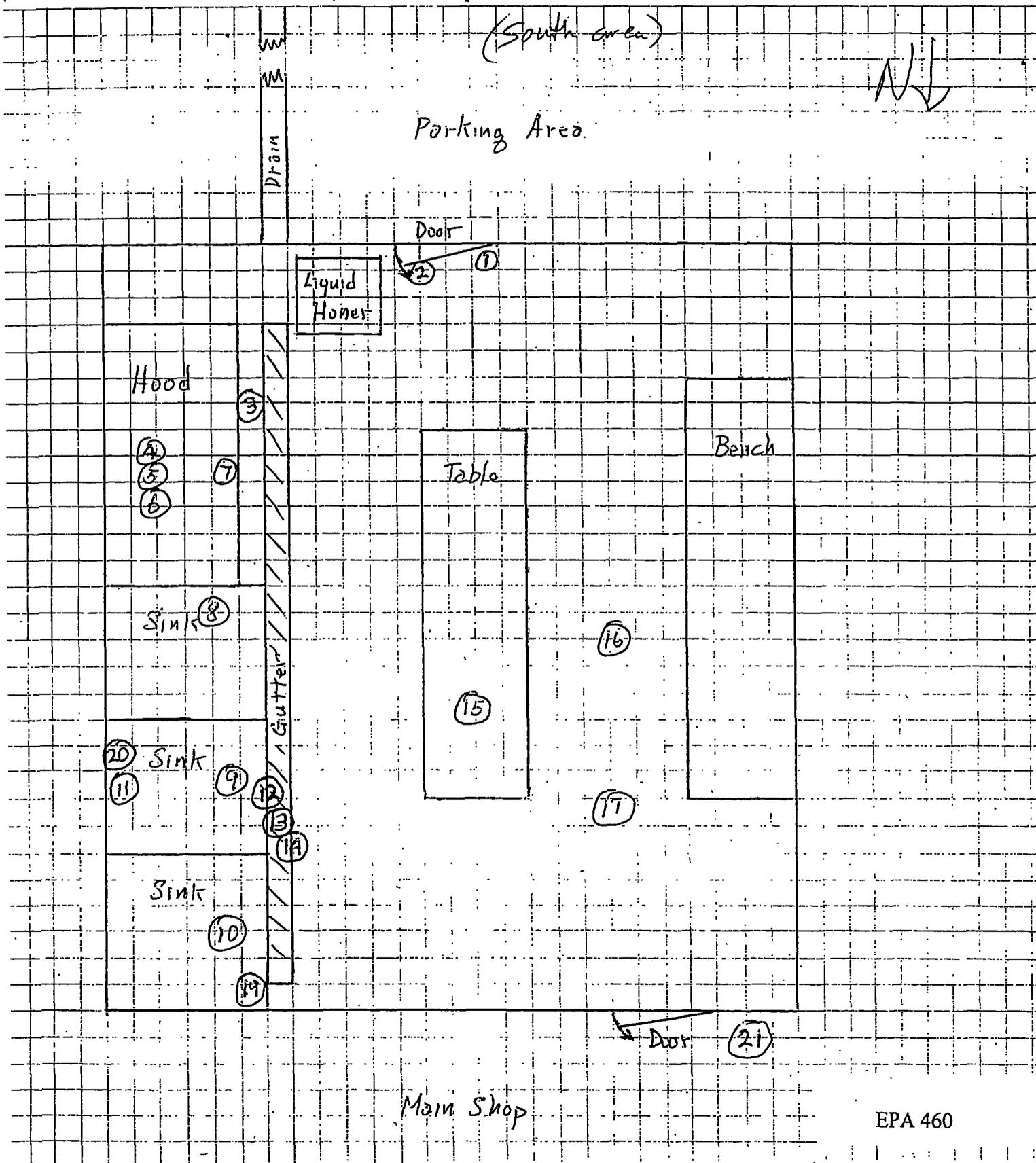


KANSAS STATE DEPARTMENT OF HEALTH  
ENVIRONMENTAL HEALTH SERVICES

Subject Standard Precision Division Date July 5, 1967

Map showing survey points in stripping room

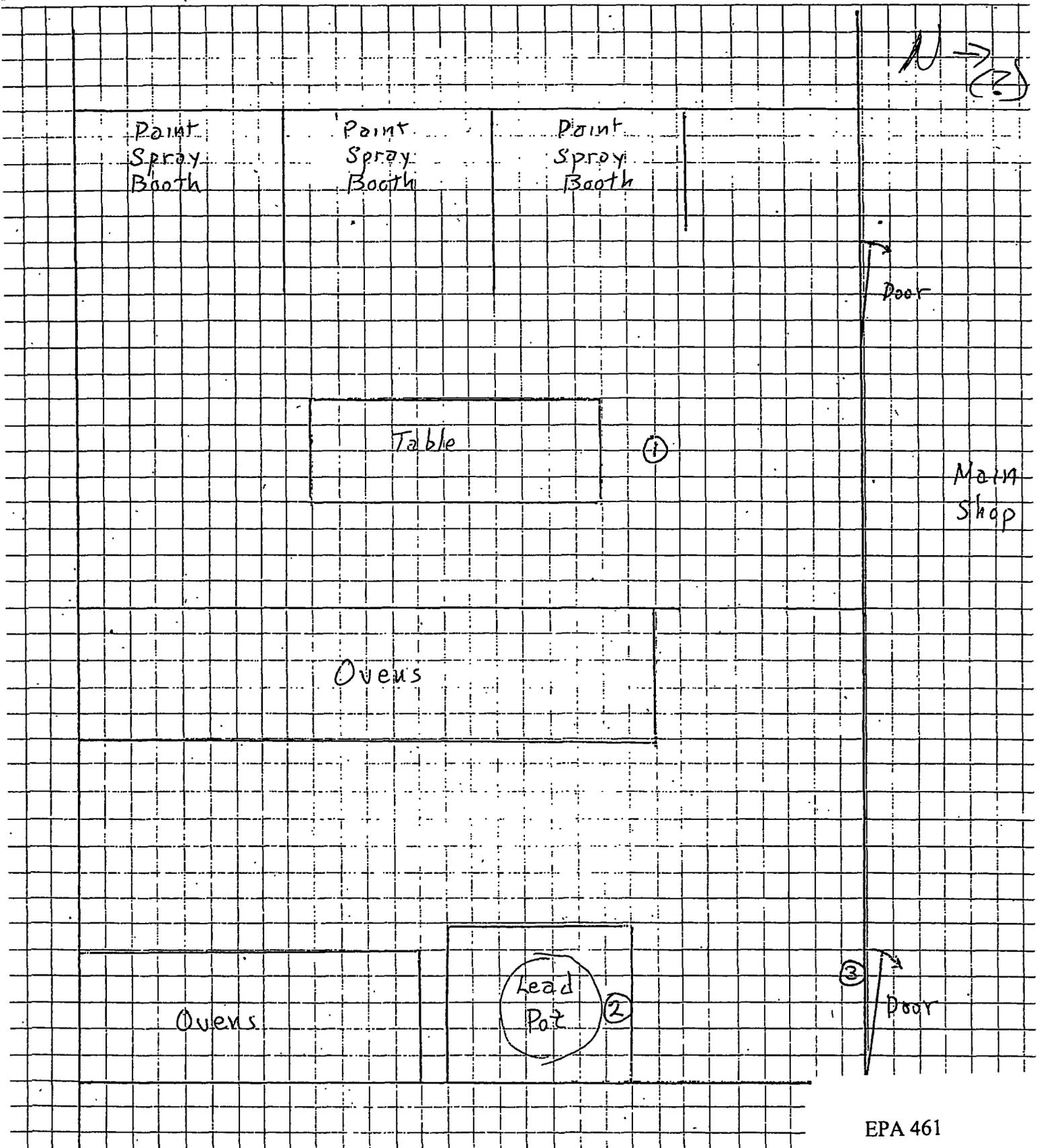
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KANSAS STATE DEPARTMENT OF HEALTH  
ENVIRONMENTAL HEALTH SERVICES

Subject Standard Precision Division Date July 5, 1967  
Map showing survey points in paint shop.

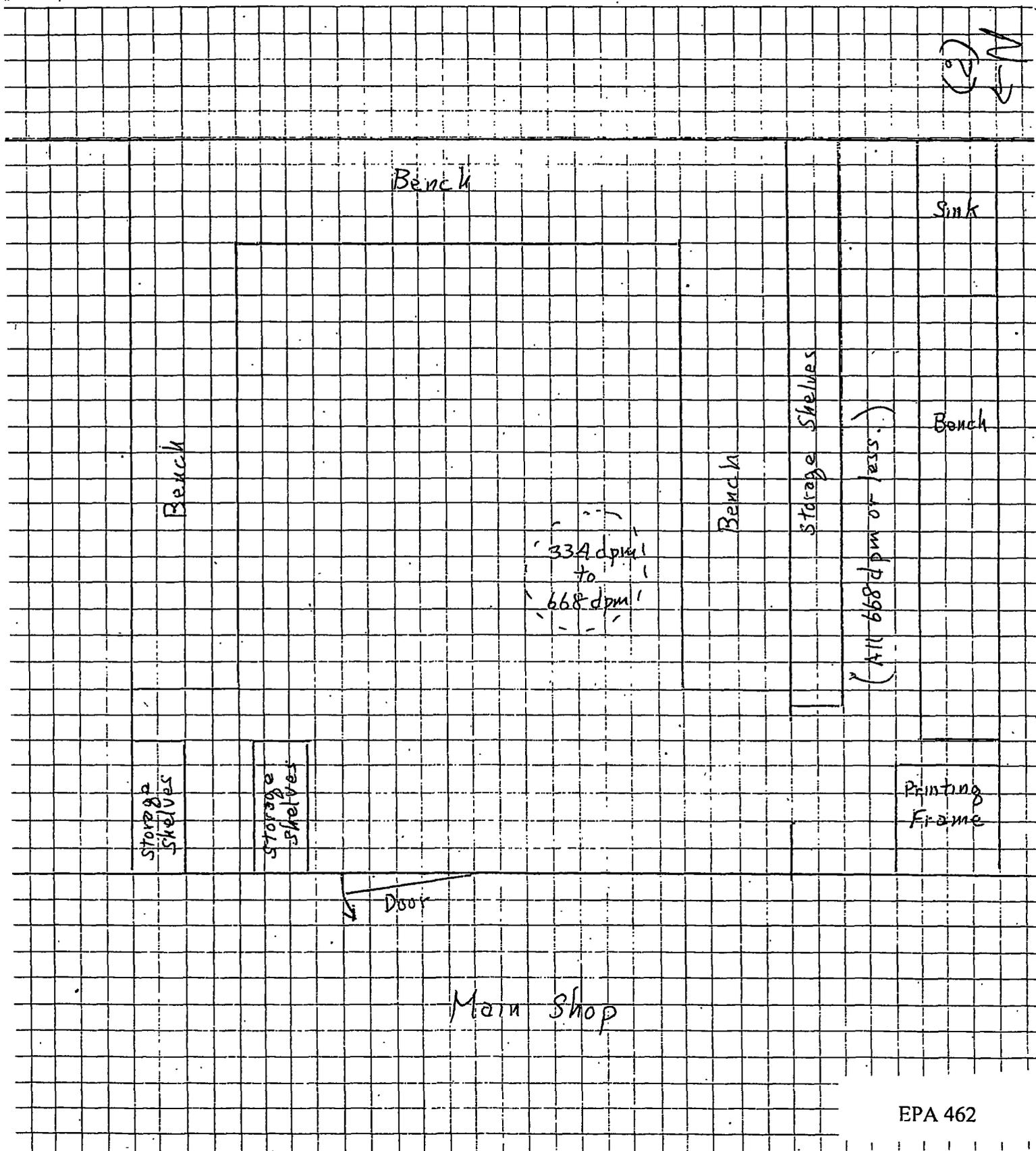
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KANSAS STATE DEPARTMENT OF HEALTH  
ENVIRONMENTAL HEALTH SERVICES

Subject Standard Precision Division Date July 5, 1967  
Map showing <sup>survey</sup> ~~surveys~~ in photography shop.

Reviewed by \_\_\_\_\_ Checked \_\_\_\_\_ Sheet \_\_\_\_\_ of \_\_\_\_\_ Sheets



KANSAS STATE DEPARTMENT OF HEALTH  
ENVIRONMENTAL HEALTH SERVICES

Subject Standard Precision Division

Date July 5, 1967

Map showing survey points in teardown area.

Reviewed by \_\_\_\_\_

Checked \_\_\_\_\_

Sheet \_\_\_\_\_

of \_\_\_\_\_

Sheets \_\_\_\_\_

Bench

(2)

Bench

(3)

(A)

Bench

shelves

(1)

Bench

Name and address of licensee  Standard Precision Division, Inc. 650 East Gilbert Wichita, Kansas	2. Date of inspection July 5, 1967  3. Type of inspection Follow up
--	---

License number(s), issue and expiration dates, scope and conditions (including amendments)

25-R061-01 expired May 31, 1967, for use of radium stripped from aircraft instruments  
 Renewal has been delayed with department consent until the completion of decontamination procedures.

Inspection findings (and items of noncompliance)

(See Attached Page)

Date of last previous inspection  December 8, 1966 by Jerome A. Halperin and Gerald W. Allen	7. Is "Company Confidential" information contained in this report? Specify page(s) and paragraph(s) <span style="float: right;">7</span> <input type="checkbox"/> Yes <input type="checkbox"/> No
--	---

distribution:

Gerald W. Allen

(Inspector)

Approved by:

Jerome A. Halperin  
 Kansas State Department of Health

(Inspection Agency)

August 14, 1967

(Date report prepared)

additional space is required for any numbered item above, the continuation may be extended on the reverse of this form using foot to head format, leaving sufficient margin at top for numbering, identifying each item by number and noting "Continued" on the face of form under appropriate item.

RECOMMENDATIONS SHOULD BE SET FORTH IN A SEPARATE COVERING MEMO

## 5. Inspection Findings

1. The decontamination of the facility was not completed and levels in excess of those agreed on by the Department and the licensee were discovered.  
(See paragraph D.4. of report)
2. A radiation area reported by Eric Geiger of Eberline Instruments Inc. around one of the waste storage barrels was not posted as required by section 28-35-86(B)(2).
3. A report on the concentration in a holding tank into which the liquid waste from the decontamination procedure had been allowed to accumulate had not been received as required by section 28-35-36(A). (See D.4. of report)
4. Mr. W.E. Hill stated that the items on the list of "hot" items provided him by Eric Geiger (attached at the end of this report) would be decontaminated or disposed of. Mr. Hill also indicated that future operations would be conducted as recommended in Eric Geiger's report when it is received by Standard Precision.
5. Surveys of the floors and work benches previously contaminated at Standard Precision were made; with the exception of the areas noted on the Eberline list all were found to be within the limits required by the Department. (see Survey Results, D.2.)

## ADMINISTRATION

- | <u>1. Persons Contacted</u> | <u>Title</u>           | <u>Responsibility</u>             |
|-----------------------------|------------------------|-----------------------------------|
| W.E. Hill                   | Chief, Quality Control | Report under license requirements |
2. Organization  
Same as inspection report dated December 8, 1966.
3. Radiation Safety  
Mr. W.E. Hill, Chief, Quality Control, is radiation safety officer.
4. Instruction of Personnel  
Same as inspection report dated December 8, 1966. New instructions are being prepared and radium painted dials are not being stripped until these are prepared.

## OPERATIONS, FACILITIES, INSTRUMENTATION

1. Use of Licensed Material  
Same as inspection report of December 8, 1966.
2. Facilities and Equipment  
Same as inspection report dated December 8, 1966.
3. Storage  
Thirteen 52-gallon drums of decontamination waste, discarded equipment and other radioactive waste are stored against the outside wall of the building adjacent to the stripping room door. Also present are three 5-gallon pails of trash and a stripping tank covered with polyethylene. This area is in a fenced yard between two buildings. Unauthorized removal is prevented by this fencing provision. The barrels were also bolted closed.
4. Restricted Area  
Area in which drums and trash is stored is between two buildings at the facility. A No. 9 wire attached between the buildings forming a triangular area where employees only are allowed composes the restricted area. Mr. Eric Geiger had reported to Mr. J. Halperin that one of the barrels in the area had surface readings of 50 mR/hr. Mr. Halperin, Chief of the Radiological Health Section, passed this information on to the inspectors during the inspection by telephone. No radiation area signs were noted by the inspectors on any of the barrels. Signs of this type were left for the use of the licensee.
5. Instrumentation  
Same as inspection report dated December 8, 1966.

## 6. Posting and Labeling

### (a) Area Posting

Satisfactory. "Caution, Radioactive Material" signs posted on the barrels and collected waste containers. The signs were also noted on the north door to the stripping area.

### (b) Container Labeling

The barrels in which waste was stored were labeled with tape containing the standard radiation trefoil and the words "Caution, Radioactive Material". On this tape written in ink, was a note which described the contents as Ra-226      mCi.

### (c) Form RH-3

Form RH-3 was posted in the stripping room.

## C. RADIOLOGICAL PRACTICES

### 1. Survey Program

The surveys of the facility are a part of the decontamination report of Mr. Eric Geiger. (See Eberline Instrument Inc. file)

## D. MISCELLANEOUS

### 1. Incidents

None

### 2. Inspector's Survey Results

See appended tables. Surveys were conducted only with the alpha survey instrument and due to the damp floors and sinks in the stripping room the results may be somewhat lower than would have been found if these areas had been dry. The areas were wet because just before the inspection some instrument cases had been washed in this area. The backup in the gutter had not yet overflowed onto the floor.

### 3. Non-State-Licensed Activities

None

### 4. Other

The only activity at Standard Precision Division since the previous inspection is the decontamination of the facility by Eberline Instrument Corp. This decontamination was not completed and the following items were reported by the licensee as still hot:

<u>Item</u>	<u>Reported Level</u>	<u>Measured Level</u>
Wooden shelf next to women's wash room	33,000 dpm/100 cm <sup>2</sup>	15,000 dpm/100 cm <sup>2</sup>
Wooden shelves next to dark room	800 dpm/100 cm <sup>2</sup>	334-668 dpm/100 cm <sup>2</sup>